

vehicle and not some other part of a vehicle. A vehicle master brake cylinder 12 (and not a vehicle wheel as required by claims 14-20) is mountable upon the vehicle stud 32 of Wierzchon. Therefore, Wierzchon does not disclose a vehicle-wheel-stud body 44 as required by claims 14-20. Claims 14 and 20 also require a first portion 24 of the vehicle-wheel-stud body 44 to have wheel-bearing-engaging first external threads 28. The first portion 46 of the vehicle stud 32 of Wierzchon has brake-booster 14 engaging first external threads (and not wheel-bearing-engaging first external threads as required by claims 14-20). Claims 14 and 20 additionally require a second portion 26 of the vehicle-wheel-stud body 44 to have wheel-nut engaging second external threads 30. The second portion of the vehicle stud 32 of Wierzchon has master-cylinder nut engaging second external threads 42. The purpose of the Wierzchon invention, as found in claim 1 and in the specification, is to provide a method which loosely retains (by deformation of a threaded attachment) a stud to a first member while allowing the stud to pivot, which then pivots the stud shaft to engage an opening in a second member, which next passes the stud shaft through the opening, and which finally threadably engages a nut on the stud shaft to attach the second member to the first member. This method would be unsuitable to use in attaching a vehicle wheel to a vehicle wheel bearing because the vehicle wheel studs must be rigidly attached to the wheel bearing to allow a vehicle wheel to be conveniently mounted on four or more vehicle wheel studs. Having four or more vehicle wheel studs be pivotably mounted on the vehicle wheel bearing would making the mounting of a vehicle wheel extremely difficult and virtually impossible for one person to do alone. Mounting (including changing) a tire on a car using the stud attaching method of Wierzchon would be a real challenge at best.

The examiner's rejection of claims 1-6 as being "obvious", under 35 U.S.C. 103, is respectfully traversed. The examiner rejects these claims as being unpatentable over Kessen '370 in view of Wierzchon. Claims 2-6 depend from claim 1. Claim 1 is directed to a vehicle wheel bearing 10 having a vehicle-wheel-bearing rotatable section 14 and a wheel stud 16, wherein the rotatable section 14 has a hole 20 having internal threads 22, and wherein the wheel stud 16 has a first portion 24 having first external threads 28 threadably attached to the internal threads 22 and has a second portion 26 having wheel-nut-engaging second external threads 30. Kessen does teach a conventional vehicle wheel bearing but without internal threads in the hole of the rotatable section and without the first portion of the wheel stud having first external threads

threadably attached to the internal threads. The examiner has alleged it would have been obvious to have replaced the threadless hole of the rotatable section of the wheel bearing of Kessen with the internally threaded hole of the brake booster of Wierzchon and that it would have been obvious to have replaced the wheel stud of Kessen with the master-cylinder stud of Wierzchon with the motivation for such replacement being "in order to prevent loosening of the wheel stud during vehicle operation while reducing manufacturing cost of the wheel bearing assembly".

Applicants respectfully disagree. The problem of preventing loosening of the wheel stud during vehicle operation, whether or not while reducing manufacturing cost of the wheel bearing assembly, is not recognized in Kessen. Preventing loosening of a wheel stud (or other vehicle stud) during vehicle operation, whether or not while reducing manufacturing cost of the wheel bearing assembly (or other vehicle assembly), is not taught in Kessen. The purpose of the Wierzchon invention, as found in claim 1 and in the specification, is to provide a method which loosely retains (by deformation of a threaded attachment) a stud to a first member while allowing the stud to pivot, which then pivots the stud shaft to engage an opening in a second member, which next passes the stud shaft through the opening, and which finally threadably engages a nut on the stud shaft to attach the second member to the first member. This method would be unsuitable to use in attaching a vehicle wheel to a vehicle wheel bearing because the vehicle wheel studs must be rigidly attached to the wheel bearing to allow a vehicle wheel to be conveniently mounted on four or more vehicle wheel studs. Having four or more vehicle wheel studs be pivotably mounted on the vehicle wheel bearing would making the mounting of a vehicle wheel extremely difficult and virtually impossible for one person to do alone. Mounting (including changing) a tire on a car using the stud attaching method of Wierzchon would be a real challenge at best.

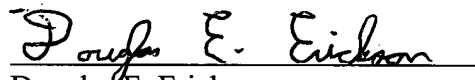
The examiner's rejection of claims 7-13 as being "obvious", under 35 U.S.C. 103, is respectfully traversed. The examiner rejects these claims as being unpatentable over Kessen '370 in view of Wierzchon. Claims 9-13 depend from claim 8. Claims 7 and 8 are directed to a vehicle wheel bearing 10 having a vehicle-wheel-bearing rotatable section 14 (or rotatable spindle 32) and a wheel stud 16, wherein the rotatable section 14/spindle 32 has a hole 20/through hole 36 having internal threads 22, and wherein the wheel stud 16 has a first portion 24 having first external threads 28 threadably attached to the internal threads 22 and has a second

Serial No.: 09/908,069  
Attorney Docket No.: DP-306261  
Amendment

portion 26 having wheel-nut-engaging second external threads 30. Kessen does teach a conventional vehicle wheel bearing but without internal threads in the hole of the rotatable section/spindle and without the first portion of the wheel stud having first external threads threadably attached to the internal threads. Applicants' previous remarks concerning the patentability of claims 1-6 over Kessen in view of Wierzchon are herein incorporated by reference.

Inasmuch as each of the rejections has been answered by the above remarks, it is respectfully requested that the rejections be withdrawn, and that this application be passed to issue.

Respectfully submitted,

  
Douglas E. Erickson  
Reg. No. 29,530

THOMPSON HINE LLP  
2000 Courthouse Plaza NE  
10 West Second Street  
Dayton, Ohio 45402-1758  
(937) 443-6814

294152